

CRAIG A. MUELLER, ESQ.  
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**MUELLER & ASSOCIATES, INC.**  
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*Attorney for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

HOGLA FLORES-REYES,  
  
Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
State of Nevada; SERGEANT BRYAN  
KIRWIN, employed with the LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT, OFFICER B. REDD,  
employed with the LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT, OFFICER ANDRE  
GONZALEZ, employed with the LAS  
VEGAS METROPOLITAN POLICE  
DEPARTMENT, LIEUTENANT JOHN W.  
LILES, employed with the LAS VEGAS  
METROPOLITAN POLICE  
DEPARTMENT, DOE OFFICERS employed  
with the LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT; DOES III through  
X; and ROE CORPORATIONS I through X,  
inclusive,  
  
Defendants.

Case No.: 2:24-cv-00302-EJY

**STIPULATION TO EXTEND TIME TO**  
**FILE OPPOSITION TO**  
**DEFENDANT'S MOTION FOR**  
**SUMMARY JUDGMENT AND**  
**EXTENSION OF TIME TO FILE**  
**REPLY IN SUPPORT OF MOTION**  
**FOR SUMMARY JUDGMENT**

(First Request)

Pursuant to Fed. R. Civ. P. ("FRCP") 6(b)(1) and local rules IA 6-1, IA 6-2, and 26-3,  
Plaintiff, by and through her attorneys of record, MUELLER & ASSOCIATES, INC., and  
Defendants, by and through their attorneys of record, MARQUIS & AURBACH, hereby stipulate  
and request that this Court extend the deadlines regarding Defendants' Motion for Summary  
Judgment (ECF No. 16) ("Motion") filed December 30, 2025. There is no hearing date.

The current deadline to file a Response to the Motion is January 20, 2025. On January 6, 2025, counsel for Plaintiff emailed a request to counsel for Defendants to inquire if counsel for Defendants would agree to an extension for Plaintiff to file her Response to the Motion and also extend the date by which Defendants may file their Reply in Support of Motion. Defendants graciously responded agreeing to an extension for “as long as you want.” Accordingly, Plaintiff is seeking a four (4) week extension of time to respond to the Motion, up to and including Monday, February 17, 2025, and Defendants shall have two (2) weeks thereafter, or up to and including March 3, 2025, to file their Reply in Support of Motion.

Good cause exists to grant the requested extension as counsel for Plaintiff’s litigation schedule is very busy during the month of January 2025, and because the Motion itself is 27 pages in length and requires additional time to prepare an Opposition.

The parties’ respective counsel has agreed on the proposed extensions to make the new deadline for Plaintiff’s Response due on or before February 17, 2025, and the Defendants’ Reply in Support extended an additional 2 weeks.

This is the first stipulation for extension of time to file a Response to the Motion and a Reply in Support of said Motion.

**IT IS SO STIPULATED.**

DATED this 14<sup>th</sup> day of January, 2025.

**MUELLER & ASSOCIATES, INC.**

*/s/ Craig A. Mueller, Esq.*

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CRAIG A. MUELLER, ESQ.  
Nevada Bar No. 4703  
808 S. 7<sup>th</sup> Street  
Las Vegas, NV 89101  
*Attorney for Plaintiff*

DATED this 14<sup>th</sup> day of January, 2025.

**MARQUIS AURBACH**

*/s/ Craig R. Anderson, Esq.*

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CRAIG R. ANDERSON, ESQ.  
Nevada Bar No. 6882  
10001 Park Run Drive  
Las Vegas, NV 89145  
*Attorneys for Defendants*

**ORDER**

Upon Stipulation by counsel for the parties, and good cause appearing therefore,

**IT IS HEREBY ORDERED** that Responsive deadlines shall be as follows:

Plaintiff's Opposition Deadline: February 17, 2025

Defendants' Reply Deadline: March 3, 2025

**IT IS SO ORDERED.**

DATED this 14th day of January, 2025.

  
UNITED STATES MAGISTRATE JUDGE

Submitted by

**MUELLER & ASSOCIATES, INC.**

*/s/ Craig A. Mueller, Esq.*

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CRAIG A. MUELLER, ESQ.

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808 S. 7<sup>th</sup> Street

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